

Exhibit A-1

CAUSE NO. CC-18-01606-C

IN RE:	§	IN COUNTY COURT
	§	
DAVID LEMUS	§	
	§	AT LAW NO. _____
	§	
	§	DALLAS COUNTY, TEXAS

**PETITIONER'S ORIGINAL PETITION TO TAKE PRE-SUIT
WRITTEN QUESTION DEPOSITION PURSUANT TO RULE 202**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Petitioner, AMPARO CAMACHO, and asks the Court for permission to take a deposition by Written Question Examination to obtain testimony to investigate a potential claim as allowed by Texas Rule of Civil Procedure 202, and in support would show the following:

INTRODUCTION

1. Petitioner, Amparo Camacho, is an individual who resides in Dallas County, Texas who may be contacted only through her undersigned attorney of record.
2. The following person is sought to be deposed:
 - David Lemus, an individual who resides at 3527 Durango Dr., Dallas, Texas 75220, in Dallas County, Texas.

BACKGROUND

3. Petitioner seeks to obtain deposition testimony in order to investigate a potential claim by petitioner.
4. No lawsuit is anticipated against deponent at this time.
5. This petition is filed in Dallas County, Texas, where on information and reasonable belief, David Lemus resides.

REQUEST TO DEPOSE

6. Petitioner asks the Court to issue an order authorizing her to examine David Lemus, by written question deposition, where Petitioner expects to elicit information relevant to an accident which occurred on February 21 or 22, 2018.

7. Petitioner seeks to investigate the involvement and/or observations of other homeowner explosion victims concerning the use of appliances and home implements.

8. Petitioner needs to depose David Lemus because the information sought will help Petitioner comply with her duty to investigate.

9. The likely benefit of allowing the petitioner to take the requested deposition to investigate a potential claim outweighs the burden or expense of the procedure.

HEARING

10. After service of this petition and notice, Rule 202.3(a) requires that the Court hold a hearing on the petition.

PRAYER

11. WHEREFORE PREMISES CONSIDERED, Petitioner asks the Court to set this petition for hearing and, after the hearing, to order the deposition by written question of David Lemus.

Respectfully submitted,

TED B. LYON & ASSOCIATES, P.C.

By: /s/ Richard Mann
Richard Mann
State Bar No. 24079640
rmann@tedlyon.com

Town East Tower, Suite 525
18601 LBJ Freeway
Mesquite, Texas 75150
Telephone: (972) 279-6571
Facsimile: (972) 279-3021

ATTORNEY FOR PETITIONER